

Benjamin Powell (SBN 214728)
benjamin.powell@wilmerhale.com
Daniel P. Kearney, Jr. (admitted *pro hac vice*)
Philip R. Seybold (admitted *pro hac vice*)
Seth Bastianelli (admitted *pro hac vice*)
WILMER CUTLER PICKERING HALE & DORR LLP
1875 Pennsylvania Avenue, NW
Washington, D.C. 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Charles V. Berwanger (SBN 047282)
cberwanger@gordonrees.com
GORDON & REES LLP
101 W. Broadway, Suite 2000
San Diego, CA 92101
Telephone: (619) 696-6700
Facsimile: (619) 696-7124

Attorneys for Defendant
HANNAH GILES

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JUAN CARLOS VERA

Plaintiff,

v.

JAMES O'KEEFE III, an individual
HANNAH GILES, an individual, and
DOES 1-20 inclusive,

Defendants.

Case No. CV 10-1422-L(MDD)
Hon. M. James Lorenz

**NOTICE OF MOTION AND
MOTION BY DEFENDANT GILES
FOR SUMMARY JUDGMENT**

Hearing: June 11, 2012
Time: 10:30 a.m.
Courtroom: Number 14
Judge: The Honorable M. James
Lorenz

1 TO JUAN CARLOS VERA, Plaintiff:

2 PLEASE TAKE NOTICE that on June 11, 2012, at 10:30 a.m. or as soon
3 thereafter as the matter can be heard in the above-referenced court located at 880
4 Front Street, San Diego, California, Defendant Giles will and hereby does move
5 this Court for an order granting summary judgment pursuant to Rule 56(a) of the
6 Federal Rules of Civil Procedure.

7 This motion is made on the ground that there is no genuine dispute as to any
8 material fact and that the Defendants are entitled to judgment as a matter of law.

9 This motion is based on the accompanying Memorandum of Points and
10 Authorities, the pleadings before this court, such other matters as the court may
11 judicially notice, and such additional arguments that may be offered at the time of
12 the hearing.

13
14
15 Dated: May 7, 2012

Respectfully submitted,
WILMER CUTLER PICKERING HALE &
DORR LLP

16
17
18 By /s/ Benjamin Powell

19 Attorney for Defendant HANNAH GILES
20 Email: benjamin.powell@wilmerhale.com
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of May, 2012, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Eugene G Iredale
Law Office of Eugene G Iredale
105 West F Street
4th Floor
San Diego, CA 92101-6036
Attorney for Plaintiff Juan Carlos
Vera

Michael E. Rosman
Christopher J. Hajec
Center for Individual Rights
1233 20th Street, NW, Suite 300
Washington, DC 20036
Attorneys for Defendant James
O'Keefe, III

Eric A. Gressler
Orrick Herrington & Sutcliffe LLP
777 South Figueroa Street
Suite 3200
Los Angeles, CA 90017-5855
Attorney for Defendant James
O'Keefe, III

In addition, a copy was sent by United States mail and e-mail to:

Michael J. Madigan
Orrick, Herrington & Sutcliffe, LLP
1152 15th Street, NW
Washington, DC 20005
(202) 339-8523
Attorney for Defendant James O'Keefe, III

/s/ Benjamin Powell

Attorney for Defendant HANNAH GILES
Email: benjamin.powell@wilmerhale.com